

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF WYOMING

In Re:)	Case No.12-21234
)	
Tomas L. Rainbolt,)	
Connie E. Rainbolt,)	CHAPTER 7
)	
Debtors.)	

TRUSTEE'S APPLICATION
TO EMPLOY PROFESSIONAL PERSON (ATTORNEY)

Tracy L. Zubrod, the duly-qualified and acting Trustee in this case, moves this Court for an Order To Employ an Attorney for the estate and in support thereof states as follows:

1. On December 20, 2012, debtors filed a voluntary petition seeking relief pursuant to chapter 7 of the Bankruptcy Code.
2. The creditors meeting was held on January 16, 2013.
3. Schedule B of the Debtor's bankruptcy petition identifies a claim against Menards for slip and fall accident.
4. It is necessary to the administration of this estate to appoint counsel to pursue this personal injury claim.
5. To the best of the applicant's knowledge, Andrew W. Snyder and Jonas I. Longoria of Chaloupka, Holyoke, Snyder, Chaloupka, Longoria & Kishiyama, P.C., L.L.O., have no connection with the debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.
6. The trustee believes the appointment of Andrew W. Snyder and Jonas I. Longoria of Chaloupka, Holyoke, Snyder, Chaloupka, Longoria & Kishiyama, P.C., L.L.O. is in the best interest of the bankruptcy estate. A copy of their Contingency Fee Agreement is attached hereto.
7. The Trustee proposes to compensate said attorneys based upon a contingency fee agreement of 25 percent (%) of all monies recovered from any source in settlement if made without the necessity of filing a lawsuit, or 33 1/3 percent (%) of all monies recovered from any source if a lawsuit is filed, subject to Court approval:

8. Andrew W. Snyder and Jonas I. Longoria of Chaloupka, Holyoke, Snyder, Chaloupka, Longoria & Kishiyama, P.C., L.L.O. are experienced and qualified to pursue this cause of action.

9. In the opinion of the Trustee, the proposed arrangement and the fee for these services is reasonable.

WHEREFORE, the Trustee requests an order to employ the attorneys upon the terms and conditions set forth above.

RESPECTFULLY SUBMITTED: July 15, 2013.

/s Tracy L. Zubrod (electronically filed)
Tracy L. Zubrod, CHAPTER 7 TRUSTEE
1907 House Avenue
Cheyenne, Wyoming 82001
(307) 778-2557
FAX: (307) 778-8225

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2013, I served a true and correct copy of this Application and the accompanying Affidavit upon the following addressed to:

Office of the United States Trustee (Via electronic notice only)

Tomas L. Rainbolt
Connie E. Rainbolt
1901 East J. Street
Torrington, WY 82240

Paul Hunter (Via electronic notice only)

/s Tracy L. Zubrod (electronically filed)
Tracy L. Zubrod